Site Remediation MACT, Part 63, Subpart GGGGG, 40 C.F.R. 63.7880 – 40 C.F.R. 63.7957

General:

- Applies to facilities where remediation is taking place and to Treatment Storage and Disposal facilities (TSDs) that receive this material
- Compliance date for most facilities was October 6, 2006
- Region 6 has many notifications from chemical companies and refineries, some from TSDs; also quarterly reports from facilities are in the files
- MACT affects process vents, leaks, and "remediation material management units"
- (40 C.F.R. '63.7882 (a)(2))
- In Region 6, MACT is delegated to both TX and LA

Major Requirements:

- Process vents are required to vent emissions to an air pollution control device
- Remediation material management units are required to control emissions by using a floating cover or a fixed roof cover and/or venting to an air pollution control device
- A leak detection and repair program is required for equipment (e.g., pumps, compressors, valves, connectors) involved in remediation

- Applicability: Must meet all three:
- Facility is cleaning up a "remediation material"
- Facility emits HAPs from one or more stationary sources and meets affected source definition for another subpart of Part 63
- Facility is a major source of HAP

Exemptions (full):

- Remediation does not clean up HAPs
- Remediation is performed under CERCLA or RCRA (for RCRA must be under permit or corrective action order)
- Gasoline stations
- Farm or residential site
- "Research and development facility" as defined by CAA

- Exemptions (but still have to do recordkeeping): Must meet all three:
- Total HAP in remediation material (annual total of all remediation projects) is less than 1 Mg/yr (40 C.F.R. '63.7881) and facility keeps written documentation of how it determined HAP content
- Remediation is a short term cleanup: All activities (including treatment at TSD) completed within 30 days of when first material is moved/treated

Work Practice Standards:

- Mirror other regulations for process vents and control devices.
- "Alternate compliance option": For remediation management units, and leaks, if these are already managed under Part 61 or Part 63, the facility can use those regulations instead of GGGGG

Numerous Rules for Offsite Facilities Receiving Wastes Subject to GGGGG:

- If average VOHAP concentration in remediation material going off-site is greater than 10 ppmw, follow 40 C.F.R. '63.7936, record-keeping, notification and emission control requirements
- Cannot send remediation material off-site unless off-site facility sends EPA a notification
- If less than 10 ppmw, no requirements regarding off-site transfer and management of material

NOTE for RCRA: The air emission requirement determination is transferred to the receiving facility, which still has to comply with 10 ppmw action level requirements for process vents (40 C.F.R. '63.7885), and 500 ppmw for remediation material management units (40 C.F.R. '63.7886)

Questions:

 Kathleen Aisling, EPA Region 6, Enforcement Officer: 214-665-6406